

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Jordana Elizabeth WEATHERLY-Isaacson,  
Gina Renee RICKARD

Defendants.

Magistrate Docket No.

COMPLAINT FOR VIOLATION OF:

Title 8, USC 1324(a)(1)(A)(ii)  
Transportation of Illegal Aliens

14 MJ0035

The undersigned complainant being, duly sworn, states:

On or about January 3, 2014, within the Southern District of California, defendant Jordana Elizabeth WEATHERLY-Isaacson and Gina Renee RICKARD, with the intent to violate the immigration laws of the United States, knowing or in reckless disregard of the fact that certain aliens, namely, Carmelita NARCISO-Salvador and Dulce GONZALEZ-Pastor, had come to, entered and remained in the United States in violation of law, did transport and move, said aliens within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

SIGNATURE OF COMPLAINANT

Jonathan Burland

Border Patrol Agent

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE,

THIS 6th DAY OF January, 2014.

BARBARA LYNN MAJOR

United States Magistrate Judge

**CONTINUATION OF COMPLAINT:**

**Jordana Elizabeth WEATHERLY-Isaacson,  
Gina Renee RICKARD**

**PROBABLE CAUSE STATEMENT**

I declare under the penalty of perjury that the following statement is true and correct:

Furthermore, the complainant states that Carmelita NARCISO-Salvador and Dulce GONZALEZ-Pastor, are citizens of a country other than the United States; that said aliens have admitted that they are deportable; that their testimony is material, that it is impracticable to secure their attendance at the trial by subpoena; and they are material witnesses in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On January 3, 2014, Border Patrol Agent R. Lopez was working the primary inspection lane at the westbound I-8 checkpoint in Pine Valley, California. The checkpoint is approximately twenty miles north of the U.S./Mexico International Boundary and about eight miles east of the Tecate, California, Port of Entry. All signs, lights and cones were fully functional and visible to the motoring public.

At approximately 7:15 a.m., a white sedan with two visible female occupants approached primary inspection. Agent Lopez identified himself as a United States Border Patrol Agent and questioned the driver, later identified as the defendant Jordana Elizabeth WEATHERLY-Isaacson, as to her citizenship. Both WEATHERLY and the female passenger, later identified as the defendant Gina Renee RICKARD, began to look nervously through their purses for identification. Due to the nervous demeanor of the occupants of the vehicle Agent Reyes referred the vehicle to secondary inspection.

In the secondary inspection area Border Patrol Agent G. Magrath identified himself as a United States Border Patrol Agent and questioned WEATHERLY as to her citizenship. WEATHERLY was visibly shaking when she responded that she was a United States citizen. Agent Magrath asked for consent to look in the trunk of the vehicle to which WEATHERLY declined. Agent Magrath then asked for consent to allow a canine to sniff the outside of the vehicle, WEATHERLY consented to this. Border Patrol Agent A. Gutierrez and his canine partner were then called over and the canine alerted to the trunk area of the vehicle. Agent Magrath informed WEATHERLY that the canine had alerted to the trunk and again asked for permission to look inside at which point WEATHERLY complied. Upon opening the trunk Agent Magrath discovered two females inside. Agent Magrath identified himself as a United States Border Patrol Agent and questioned the two individuals, later identified as Dulce GONZALEZ-Pastor and Carmelita NARCISO-Salvador, as to their citizenship and nationality. Both individuals admitted to being citizens and nationals of Mexico without proper immigration documents allowing them to enter or remain in the United States legally.

**CONTINUATION OF COMPLAINT:**


**Jordana Elizabeth WEATHERLY-Isaacson,  
Gina Reneee RICKARD**

At approximately 7:30 a.m., Agent Magrath placed WEATHERLY and RICKARD under arrest for alien smuggling, and GONZALEZ and NARCISO under arrest for entry without inspection. He then arranged for their transport to the Campo Station for further processing.

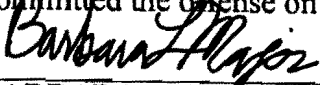
WEATHERLY was advised of her Miranda rights. She stated she understood her rights and was willing to answer questions without an attorney present. WEATHERLY stated that she was contacted by an individual named Shawn who offered her \$1,000 USD to smuggle two illegal aliens from El Centro, California. WEATHERLY stated that she went to RICKARD's house and said, "let's go make some money," offering her \$500 for accompanying her with picking up two people from El Centro. WEATHERLY stated she was directed by Shawn to go to the Sun Valley Inn & Suites, room 122, in El Centro to collect the aliens. WEATHERLY stated that she entered the hotel room with RICKARD and then exited with two females, who entered the car with them and sat in the back seat. WEATHERLY stated that before approaching the Border Patrol Checkpoint she became nervous and pulled over to the side of the road. WEATHERLY stated she instructed the female passengers in the backseat to exit the vehicle and get in the trunk, while RICKARD was yelling, "go,go,go," as they exited. WEATHERLY then got out of the vehicle and closed the trunk.

Material Witness Dulce GONZALEZ-Pastor admitted to being a citizen and national of Guatemala not in possession of any documents allowing her to enter or remain in the United States legally. Material Witness Carmelita NARCISO-Salvador admitted to being a citizen and national of Mexico not in possession of any documents allowing her to enter or remain in the United States legally. GONZALEZ stated that she was paying \$2,000 USD to be smuggled into the United States.

**Executed on January 4, 2014 at 10:00 a.m.**

  
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Amanda L. Alba  
Border Patrol Agent

On the basis of the facts presented in the probable cause statement consisting of two pages, I find probable cause to believe that the defendant named in this probable cause statement committed the offense on January 3, 2014, in violation of 8 USC 1324(a)(1)(A)(ii).

  
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BARBARA LYNN MAJOR  
U.S. Magistrate Judge

2:26 PM, Jan 4, 2014

\_\_\_\_\_  
Date/Time